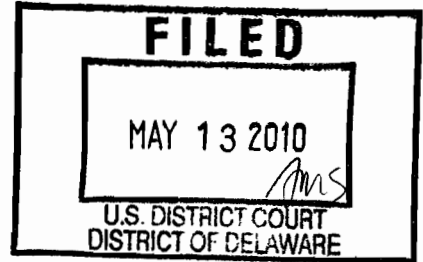


IN THE UNITED STATES DISTRICT COURT

DISTRICT OF DELEWARE



TIERA MANNING,

*

Plaintiff,

*

-vs-

* Case No: 10 - 400

BANK OF AMERICA,

*

Defendant.

*

COMPLAINT

JURISDICTION

Jurisdiction of this court arises under 28 U.S.C. 1331 and pursuant to 15 U.S.C. 1681 et seq, and pursuant to 28 U.S.C. 1367 for pendent state law claims. This action arises out of Defendant's violations of the Fair Credit Reporting Act., 15 U.S.C. 1681, et seq' ("FCRA")

PARTIES

Plaintiff, Tiera Manning., is a natural person residing in the State of Georgia, County of Richmond. Plaintiffs address is 2545 Wheeler Rd, Apt. 13, Augusta, Georgia 30904.

Defendant Bank of America, does business in Georgia and Delaware, and its registered agent is Corporation Trust Company and is located at 1209 Orange Street, Wilmington, Delaware 19801

VENUE

Venue is proper in this district because the acts and transactions occurred here, and the Defendants transact business here.

FACTS

In March 2010, after reviewing Plaintiff's credit report. Plaintiff noticed a collection listed by the Bank of America. Doubting the veracity and accuracy of this listing Plaintiff initiated a dispute via Experian's Online Consumer Dispute Resolution interface. Plaintiff also sent a letter disputing the accuracy of this account to Bank of America.

In or about April 2010 Bank of America reported this item as verified to Experian.

Despite Plaintiff's request for reinvestigation, and never having actually been provided verification, Defendants continued to list this debt on Plaintiffs Credit report.

Defendant Bank of America furnished inaccurate information about this debt, namely that said account was disputed by the Plaintiff in violation FCRA 623(a)(5) ; FDCPA 807(8); and 15 USC 1681s-2(b). Defendant Bank of America also was aware of the disputed nature of said accounts and failed to ensure that said accounts were accurately reported.

As a result of the Defendants activities or lack thereof the Plaintiff has suffered loss of self-esteem and peace of mind, and has suffered emotional distress, humiliation and embarrassment, and defamation of Credit.

The acts and omissions of the Defendants and its representatives, employees and or agents constitute numerous and multiple violations of the FCRA.

Pursuant to the FCRA the Plaintiff is entitled to actual damages, statutory damages, and reasonable costs and fees.

WHEREFORE, Plaintiff respectfully requests that judgment be entered against the Defendant for the following:

- (a) actual damages.
- (b) Statutory damages

(c) costs and reasonable fees

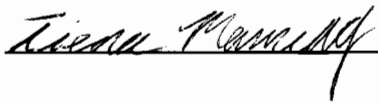
(d) punitive damages

(e) For such other relief as the court may deem just and proper.

Tiera Manning./Pro Se:

2545 Wheeler Road

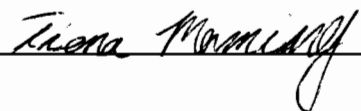
Augusta, Georgia 30904

_____

DEMAND FOR JURY TRIAL

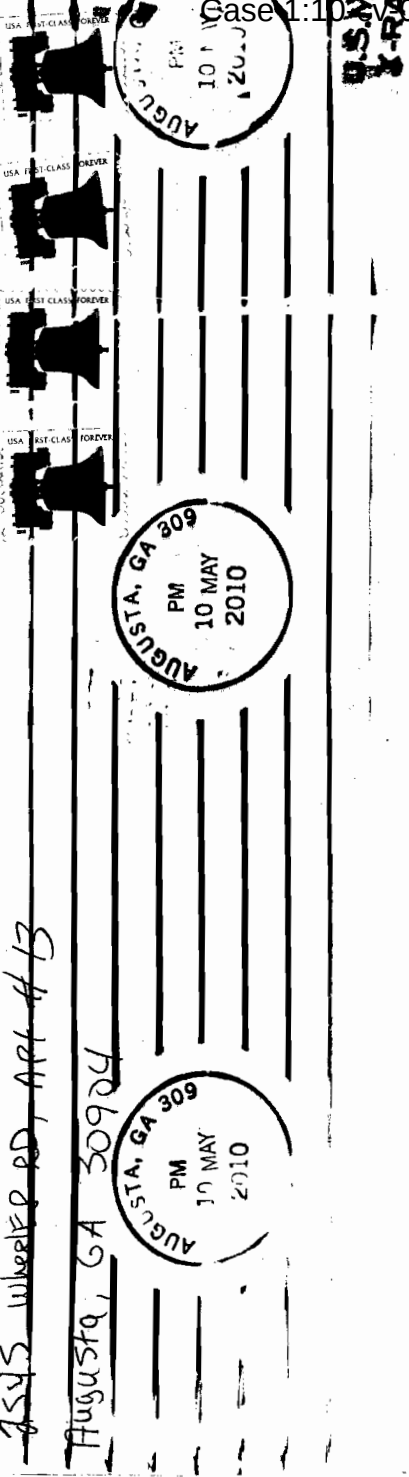
Please take note that Plaintiff demands trial by jury in this action.

Date: 5/6/10

Signature: _____

2545 Wilber RD, Apt #13

Augusta, GA 30904



Clerk, U.S. District Court
District of Delaware
844 N. King Street
Wilmington, Delaware 19801